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14 [Counsel for Defendants on signature page]

15 **UNITED STATES DISTRICT COURT**  
16 **EASTERN DISTRICT OF CALIFORNIA**

17 DORA SOLARES,

18 Plaintiff,

19 v.

20 RALPH DIAZ, in his individual  
21 capacity, KENNETH CLARK, in his  
22 individual capacity, JOSEPH BURNS,  
23 in his individual, and DOES 1 TO 15, in  
24 their individual capacities

25 Defendants.

Case No. 1:20-cv-00323-LHR-BAM

**[PROPOSED] STIPULATED  
AMENDED SCHEDULING AND  
DOCKET CONTROL ORDER; AND  
ORDER THEREON**

Hon. Lee H. Rosenthal

26  
27 **COME NOW** Plaintiff Dora Solares and Defendants Burnes, Gallemore,  
28 Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva hereby

1 stipulate and submit the following proposed amended schedule to control the above-  
2 listed matter:

3  
4  
5  
6 1. June 20, 2025

**COMPLETION OF NON-EXPERT  
DISCOVERY**

7  
8 Written discovery requests are not  
9 timely if they are filed so close to this  
10 deadline that under the Federal Rules of  
11 Civil Procedure the response would not  
12 be due until after the deadline.

13 2. June 30, 2025

**EXPERTS ON MATTERS OTHER  
THAN ATTORNEYS' FEES**

14  
15 The plaintiff (or the party with the  
16 burden of proof on an issue) will  
17 designate expert witnesses in writing  
18 and provide the report required by Rule  
19 26(a)(2) of the Federal Rules of Civil  
20 Procedure.

21 3. July 30, 2025

**OPPOSING EXPERTS**

22 The opposing party will designate  
23 expert witnesses in writing and provide  
24 the report required by Rule 26(a)(2) of  
25 the Federal Rules of Civil Procedure.

26 4. August 22, 2025

**CLOSE OF EXPERT DISCOVERY**

27 5. September 5, 2025

**PRETRIAL DISPOSITIVE  
MOTIONS DEADLINE**

28 No motion may be filed after this date  
except for good cause.

6. October 30, 2025

**JOINT PRETRIAL ORDER AND  
MOTION IN LIMINE DEADLINE**

The Joint Pretrial Order will contain the pretrial disclosures required by Rule 26(a)(3) of the Federal Rules of Civil Procedure. Plaintiff is responsible for timely filing the complete Joint Pretrial Order. Failure to file a Joint Pretrial Order timely may lead to dismissal or other sanction in accordance with the applicable rules.

7. November 14, 2025

**DOCKET CALL**

Docket Call will be held at 2:00 p.m. in a location to be determined. No documents filed within 7 days of the Docket Call will be considered. Pending motions may be ruled on at docket call, and the case will be set for trial as close to the docket call as practicable.

Any party wishing to make any discovery motions should arrange for a pre-motion conference with the court before the preparation and submission of any motion papers. That includes a motion to compel, to quash, or for protection. Email Glenda Hassan at [glenda\\_hassan@txs.uscourts.gov](mailto:glenda_hassan@txs.uscourts.gov) and Mrs. Eddins at [Lisa\\_Eddins@txs.uscourts.gov](mailto:Lisa_Eddins@txs.uscourts.gov) or fax her at 713-250-5213 to arrange for a pre-motion conference. Notify your adversary of the date and time for the conference.

Respectfully submitted,

Dated: March 31, 2025

LAW OFFICES OF ERIN DARLING

By: /s/Erin Darling

Erin Darling,

Attorneys for Plaintiff Dora Solares

Dated: March 31, 2025

Respectfully submitted,

ROB BONTA

Attorney General of California

JON S. ALLIN

Supervising Deputy Attorney General

***/s/Jeremy Duggan (as authorized on 3/31/25)***

JEREMY DUGGAN

Deputy Attorney General

*Attorneys for Defendants*

*Burnes, Gallemore, Gamboa, Garcia, Maytubby, Munoz, Loza, and Pena*

Dated: March 31, 2025

ANDRADA & ASSOCIATES

***/s/ Lynne G. Stocker (as authorized on 3/31/25)***

By: Lynne G. Stocker

*Attorneys for defendant SILVA*

IT IS SO ORDERED.

Dated: April \_\_. 2025

\_\_\_\_\_  
LEE H. ROSENTHAL  
UNITED STATES DISTRICT JUDGE